

Joseph F. Postnikoff
State Bar No. 16168320
Email: jpostnikoff@romclaw.com
Zachary G. Levick
State Bar No. 24119380
Email: zlevick@romclaw.com
ROCHELLE MCCULLOUGH, LLP
300 Throckmorton Street, Suite 520
Fort Worth, Texas 76102
Telephone – 817.347.5260
<http://www.romclaw.com>

PROPOSED COUNSEL FOR SHAWN K. BROWN,
CHAPTER 7 TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:	§	
DUAL D HEALTH CARE	§	Case No. 17-41320-ELM-7
OPERATIONS, INC., D/B/A	§	
KEMP CARE CENTER, LLC,	§	In Proceedings Under Chapter 7
Debtor.	§	

**SUPPLEMENTAL DISCLOSURE CONCERNING EMPLOYMENT OF
EXPERT ANKURA CONSULTING GROUP, PLLC**
[Refers to Docket No. 63]

Jerry M. Chang, being duly sworn in view of the *Application for Approval of Employment of Expert* filed January 20, 2022 [Docket No. 61] and *Order Granting Application for Approval of Employment of Expert* entered February 17, 2022 [Docket No. 63] in the above-entitled matter, hereby deposes and states:

1. My name is Jerry M. Chang, CFA. I am over twenty-one (21) years of age, of sound mind, capable of making this Supplemental Disclosure and fully competent to testify to the matters stated herein, and I have personal knowledge of the matters set forth herein.
2. Effective as of December 6, 2022, I became engaged as a Managing Director of

Berkeley Research Group, LLC (“BRG”). Prior to that time was a Senior Managing Director of Ankura Consulting Group, LLC (“Ankura”).

3. In connection with the referenced bankruptcy proceeding, on January 20, 2022, Shawn K. Brown, Chapter 7 Trustee (“Trustee”) of the bankruptcy estate of Dual D Health Care Operations, Inc. (“Dual D”) filed his *Application for Approval of Employment of Expert* [Docket No. 61] (the “Application”) and on February 17, 2022, this Court entered its *Order Granting Application for Approval of Employment of Expert* [Docket No. 63] (“Order”) pursuant to which the expert employment of Ankura was approved.

4. During my term of employment with Ankura, I was the Senior Managing Director primarily responsible for the Dual D engagement. In that regard, I was teamed up with John Leary who was and continues to be associated with Ankura.

5. The terms of Ankura’s expert employment were governed by that certain Engagement Letter dated August 18, 2021, Engagement Letter Addendum – Phase 3 Services dated January 18, 2022, the Application and Order (the “Employment Documents”).

6. On December 6, 2022, I joined BRG as a Managing Director. John Leary continues to be associated with Ankura.

7. The Trustee has requested that I continue in my role as expert in the Dual D proceedings and Ankura and BRG have reached an agreement pursuant to which my services rendered in connection with the Dual D engagement will be subcontracted to Ankura consistent with the Employment Documents. As a result, there will be no interruption in or duplication of services provided or to be provided to the Trustee in the Dual D matter by Ankura nor in the billing practices employed by Ankra. There will be no change with respect to John Leary participation in the engagement.

8. BRG has no stake in the outcome of the subject litigation specifically or in the outcome to the bankruptcy estate generally. Other than payment of its fees and expenses pursuant to the subcontract with Ankura, the interests of BRG are to perform services at the highest professional level and to maintain an excellent reputation for expertise and integrity. BRG is a “disinterested” party.

9. I will file supplemental disclosures with this Court should there be additional changes with respect to the expert employment of Ankura and subcontract with BRG in the Dual D proceeding.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this the 22 day of February, 2023.



JERRY M. CHANG

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22nd day of February, 2023, a copy of the foregoing Supplemental Disclosure was served by the Court's electronic case filing system on all parties registered to receive ECF service and by first-class United States mail, postage prepaid, on the persons named on the attached service list.

Respectfully submitted,

ROCHELLE MCCULLOUGH, LLP
300 Throckmorton Street, Suite 520
Fort Worth, Texas 76102
Telephone – 817.347.5260
<http://www.romclaw.com>

By: /s/ Joseph F. Postnikoff
Joseph F. Postnikoff
State Bar No. 16168320
Email: jpostnikoff@romclaw.com
Zachary G. Levick
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